

**WRITTEN TESTIMONY OF**  
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**SENIOR ADVISOR**  
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**BEFORE THE**  
**HONORABLE JOHN PAUL WOODLEY, JR**  
**ASSISTANT SECRETARY OF THE ARMY FOR CIVIL WORKS**

**June 5, 2008**

**INTRODUCTION**

Mr. Secretary my name is John Burns and I am a Senior Advisor with Dawson & Associates, Inc. representing Tierra Solutions, Inc. We would like to applaud your leadership in moving so quickly to begin the process of updating the Principles & Standards (P&S) part of the Principles and Guidelines (P&G). The P&G is an excellent document and the P&S has provided a powerful planning framework for the planning of our Nation's water resources projects, but after more than 25 years of changing values, mission areas, and analytical tools they are in need of updating

We have reviewed the P&S based on our experience in working for our client Tierra Solutions on the Passaic River Restoration Feasibility Study and we have several recommendations for your consideration. In making these suggestions to you, our goal is to help achieve the most cost-effective comprehensive plan for restoration of the Passaic River, in particular, and urban rivers, in general.

**ISSUES AND RECOMMENDATIONS**

The **first issue** that we have identifies is that the present version of the P&S does not reference ecosystem restoration as a planning objective. The P&S were developed before the current focus and Federal priority on restoring historical hydrologic regimes as a Corps mission area and focus more heavily on economic outputs to the exclusion of environmental outputs.

To bring the P&G into harmony with current policies and priorities related to ecosystem restoration we recommend that the P&G be updated to emphasize Ecosystem Restoration as an operationally meaningful planning objective for those projects concerned with restoring ecologically degraded waterways and watersheds.

The **second issue** that we have identified is that the present version of the P&S does not acknowledge Human Health and Safety as a relevant objective in many planning studies such as those for storm and flood damage reduction or for urban river restoration where such considerations may be important in plan formulation.

To more appropriately incorporate consideration of Human Health and Safety into water resources planning, we recommend that the P&S be updated to affirm Human Health and Safety as an appropriate planning objective for studies where possible project alternatives may improve these important components of human well-being.

The **third issue** that we have identified is that the present version of the P&S does not encourage planners to subject all elements of water resource planning to incremental analysis and justification. This is a legacy of the traditional separation of Army Civil Works projects and programs from other Federal programs concerned with restoring and protecting the nation's resources. This legacy no longer makes sense in light of present understandings of the interactions among the various aspects of water resources and their contributions to human well-being and ecological integrity. Such interactions are recognized in current Corps of Engineers missions and specific project authorizations. Continued adherence to a standards-based approach for water quality and for resource protection and restoration in general, and treatment of these standards as constraints in plan formulation denies important information to decision makers and may result in unproductive use of both public and private resources. It is important that the new P&S recognize the expanded role of the Corps in water planning nationwide.

To encourage planners to expand the application of incremental analysis beyond the area of monetized benefits, we recommend that the P&S be updated to direct that water quality and other environmental standards be considered as planning "targets" rather than planning constraints. Furthermore, the P&S should be updated to direct that studies document and display incremental changes in project benefits and costs associated with project components that contribute to ecosystem health and human well-being.

## **SUMMARY**

Mr. Secretary, I appreciate the opportunity to be here to today and to provide you with our thoughts as you move forward with this important update to our Nation's water resources planning framework . After more that two decades of showing the way, the P&G are in need of updating to reflect the growth of scientific knowledge and improved analytical techniques that have occurred since they were established by President Reagan in February of 1983. The changes we are recommending to you today are necessary to ensure that the Corps continues to be able to provide leadership in water resource planning nationally and internationally in the years to come.